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Attorneys for Plaintiff
MARIE WESTBROOK

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARIE WESTBROOK,

Plaintiff,

vs.

IRIS CENTER WOMEN'S COUNSELING
and RECOVERY SERVICES,

Defendant.

Case No. C04-05388 JSW

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND
MEDIATION CUTOFF DATE**

Complaint filed: December 21, 2004
Trial Date: March 13, 2006

Pursuant to Civil Local Rule 6-1(b) and 6-2, Plaintiff Marie Westbrook ("Ms.
Westbrook"), and Defendant Iris Center Women's Counseling And Recovery Services ("Iris

Center”) hereby submit this Stipulation and [Proposed] Order to Extend the Mediation Cutoff Date.

WHEREAS, the mediation in this case is currently scheduled for July 25, 2005;

WHEREAS, the deposition of Trena Patton, former Executive Director of Iris Center, took place on June 9th, 2005;

WHEREAS, the deposition of Ms. Westbrook was originally scheduled for June 8, 2005 but did not go forward on that date due to a written discovery dispute;

WHEREAS, due to scheduling conflicts for both parties, Ms. Westbrook's deposition cannot not be rescheduled sooner than July 25th, 2005;

WHEREAS, due to her illness, the deposition of Jessica Ryan, former Administrative Director of Iris Center, could not proceed as originally scheduled and will have to be rescheduled after July 25, 2005;

WHEREAS, the parties would like to have Ms. Westbrook and Ms. Ryan's depositions completed prior to the mediation, in order to have a more complete set of facts to make the mediation optimally productive;

WHEREAS, due to a preplanned vacation and a trial, mediator Jeffrey Ross' next available mediation date after July 25th is September 19th, 2005;

WHEREAS, September 19th, 2005 is the first mutually available date for all parties to attend a mediation.

NOW THEREFORE, for the reasons stated herein, and the Declaration of Jordan Cunningham filed herewith, the parties stipulate and request the Court order as follows:

1. The Mediation Cutoff Date is continued until September 30th, 2005 to allow for mediation to occur on September 19th, 2005.

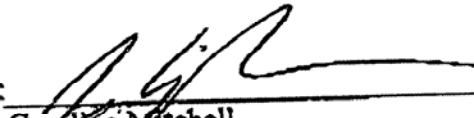
IT IS SO STIPULATED.

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Respectfully submitted,

JONES DAY

Dated: June 14, 2005.

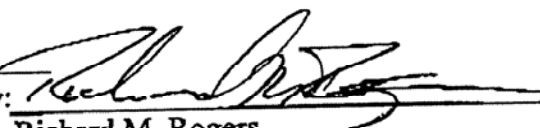
By: 
Caroline Mitchell
Theresa Langa
Jordan Cunningham

COUNSEL FOR DEFENDANT IRIS
CENTER

Respectfully submitted,

MAYO & ROGERS

Dated: June 14, 2005.

By: 
Richard M. Rogers

COUNSEL FOR PLAINTIFF
MARIE WESTBROOK

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 15, 2005

/s/ Jeffrey S. White
United States District Judge